

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Willie Doss

Case No.

Case: 2:22-mj-30210

Assigned To : Unassigned

Assign. Date : 5/3/2022

Description: RE: SEALED  
MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/11/20 and 3/3/20 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

18 U.S.C. § 922(g)(1)

Felon in Possession of Ammunition

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Rohit Joshi, ATF

Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Judge's signature

Date: May 3, 2022City and state: Detroit, Michigan

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Rohit Joshi, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) since August 2016. I am currently assigned to the Detroit, Michigan Field Division, Group I. I am tasked with investigating violations of firearms and narcotics laws. I also have been involved in numerous investigations involving violations of federal firearms and narcotics laws. Prior to my employment with the ATF, I was employed by the Wayne State University Police Department, Detroit, Michigan, for approximately ten years as a Police Officer and Sergeant, which included six years as a Task Force Officer (“TFO”) with the Detroit Police Department’s Commercial Auto Theft Section/Carjacking Unit. During this employment, I investigated violations of State of Michigan laws relating to firearms, narcotics, carjacking, armed robbery, auto theft, insurance fraud, and motor vehicle title fraud. In addition, I have completed both the Criminal Investigator Training Program and Special Agent Basic Training at the Federal Law Enforcement Training Center, and I have completed the Michigan Law Enforcement Basic Training Academy. Through my training, education, and experience, I have become familiar with the manner in

which criminals operate their clandestine activities, including drug and firearms traffickers. I also have investigated drug houses and how they operate. In addition, I have experience using undercover informants in narcotics and firearms trafficking investigations.

2. The facts contained in this affidavit are based on my review of information provided to me by and/or through other law enforcement agents, investigators, informants, witnesses, and individuals with knowledge of this matter, as well as my investigation, and my review of documents. The information outlined below is provided for the limited purpose of obtaining the requested Criminal Complaint and does not contain all details or all facts of which I am aware relating to this investigation. This affidavit provides information necessary to establish probable cause Willie DOSS, (Date of Birth: XX-XX-1999), has violated Title 18, United State Code, Section 922(g)(1), possession of a firearm and ammunition by a convicted felon.

## **II. SUMMARY OF THE INVESTIGATION**

3. During the month of January 2020, I conducted a review of the Facebook page of “Cedrick McGruder” (Facebook User ID: 100002229370057)—which is the username for a Facebook account associated with Cedrick MCGRUDER (DOB: XX/XX/1993), a convicted felon—and MCGRUDER’s Facebook messages with Facebook User “Hunnit Grand Will.” The information

regarding Facebook User “Cedrick McGruder” was obtained pursuant to a federal search warrant (Case # 2:19-mc-51624, issued on November 4, 2019). As described below, based on information obtained in the course of this investigation, I believe that “Hunnit Grand Will” is the username for a Facebook account associated with Willie DOSS.

**Facebook Conversations between “Cedrick McGruder” and  
“Hunnit Grand Will”**

4. On August 2, 2019, “Hunnit Grand Will” sent MCGRUDER a Facebook message, “Yo this will you still got that for sale?” MCGRUDER replied, “Hell yea lil bro,” and, “What’s your number ima call you in the morning.” “Hunnit Grand Will” replied, “3139711975.” MCGRUDER replied, “Man U been playin all day I been on joann n state fair all day,” and, “Man k2 said you ain’t have the cheese on u.” “Hunnit Grand Will” replied by sending the below image depicting U.S. Currency and the message, “Aye bro whats the lowest you a go for that g-lock for me.” MCGRUDER replied, “400 wit the 22 clip I’ll have to put the 16 clip in there and I’ll give it to u for 375 that’s if I find the clip.” “Hunnit Grand Will” replied, “Ill do fhe 4 give me to Monday.”



5. Based on my training and experience, the aforementioned statements are consistent with “Hunnit Grand Will” asking MCGRUDER if he still has the “Glock” handgun for sale. MCGRUDER responded that the asking price is \$400 for the handgun with a 22-Round magazine, or \$375 with a 16-Round magazine (assuming he could find the 16-Round magazine). “Hunnit Grand Will” agreed to pay \$400 and asked MCGRUDER to give him the handgun on Monday, which would have been August 5, 2019.

6. During January 2020, I submitted an image of “Hunnit Grand Will” taken from the Facebook account to be analyzed by the Michigan State Police (MSP) Digital Image Analysis Section to determine the identity of “Hunnit Grand Will.” MSP identified DOSS as the individual in the image. In addition, I compared the profile pictures associated with the Facebook account with Facebook

username “Hunnit Grand Will” to DOSS’s Michigan Driver’s License photograph, and I determined that the photographs depicted the same person, Willie DOSS.

### **DOSS’s Facebook Posts**

7. During February 2020, I conducted an open-source review of DOSS’s Facebook page, which at the time was accessible to the public.

a. On September 7, 2019, DOSS was on Facebook Live appearing to be in possession of a Glock firearm. Facebook Live is a feature of Facebook where users can broadcast real-time video to Facebook by using a camera on a computer or mobile device. I viewed the video, and the following images are still images taken from the Facebook Live video of his broadcast. In addition, the video depicts DOSS rapping and referring to the firearm as a .40 Caliber.

i. The video depicts DOSS possessing a firearm, which appears consistent with a Glock handgun, based on my training and experience.



b. On December 28, 2019, DOSS was on Facebook Live in possession of a firearm. I viewed the video, and the following images are still images taken from the Facebook Live video of his broadcast.

- i. The video depicts DOSS holding a black handgun storage box, and then removing a firearm from the storage box.



- ii. The video also depicts DOSS holding a firearm and a magazine containing ammunition rounds, as DOSS appears to be using marijuana.





- iii. The video also depicts DOSS holding an extended magazine containing ammunition rounds. In addition, it depicts DOSS detaching and attaching the extended magazine into the firearm. I know, based on training and experience, that the ability to attach and detach a magazine is a feature indicative of a firearm.



- c. On January 22, 2020, DOSS posted a video to Facebook of himself in a bathroom with a female (later identified as J.S., as described below). I viewed this video, and the following images are still images taken from the video. The video appears to depict a firearm on the bathroom counter and being held by DOSS.



- d. On January 22, 2020, DOSS posted a video of himself and a female (later identified as J.S, as described below) in a room. I

viewed this video, and the following images are still images taken from the video. The video depicts a firearm being held by DOSS as well as DOSS in possession of a substance that, in my training and experience, is consistent with cocaine.





- e. On February 11, 2020, DOSS was on Facebook Live possessing a Glock Model 23 handgun with a high-capacity magazine with ammunition. I viewed the video, and the following images are still images taken from the Facebook Live video of his broadcast.
  - i. The video depicts DOSS wearing a black hoodie and a surgical-style mask. Based on my training and experience, and a review of other videos posted on DOSS's Facebook account, DOSS's voice in this video is consistent with the voice audible in other videos posted on his Facebook account in which DOSS was not disguising his face.



- ii. The video also depicts DOSS holding a Glock Model 23 handgun with an extended magazine containing ammunition rounds.



- iii. The video also depicts the word “Austria” and the number “23” imprinted on the slide of the firearm. I know, based on training and experience, that the Glock Model 23 is a .40 Caliber firearm.



- iv. The video further depicts the “rifling” in the barrel of the firearm. I know, based on training and experience, rifling allows a bullet to spin as it passes through the barrel and is an indicative feature of a firearm.



- v. The video further depicts DOSS holding the extended magazine containing ammunition rounds. In addition, DOSS detaches and attaches the extended magazine into the firearm; this is another feature, based on my training and experience, that is indicative of a firearm.

8. From September 2019 through February 2020, DOSS posted videos of himself in possession of what appear to be three different types of firearms, based on my training and experience.

9. I reviewed Michigan Department of Corrections (MDOC) records relating to DOSS. Per MDOC, DOSS reported residing with his girlfriend, J.S., at \*\*\*1 East Outer Drive, Apartment # B-1\*\*, Detroit, Michigan, since December 23, 2019. I identified J.S. as the female portrayed in the aforementioned Facebook



videos by comparing them to J.S.'s Michigan driver's license photograph. I determined that the videos and driver's license photograph depicted the same person, J.S.

**Search Warrant Execution at \*\*\*1 East Outer Drive**

10. On March 2, 2020, a federal search warrant was issued for DOSS's residence (Case # 20-50324-1 Revised). ATF executed the search warrant on March 3, 2020. The only individual present at the residence, a one-bedroom apartment, was J.S. Law enforcement observed men's clothing and shoes inside the bedroom and closet.

11. Law enforcement searched the residence and seized the following items from the residence:

- i. One (1) thirteen-round Glock Magazine, containing thirteen (13) .40 caliber ammunition rounds seized from the bedroom;
  1. The Glock magazine was lying on top of the dresser in plainview.
- ii. One (1) rental document in the name of J.S. relating to nonpayment of rent, dated February 12, 2020, seized from the bedroom closet;

- iii. One (1) document in the name of J.S. relating to an eviction notice seized from the front closet;
- iv. One (1) 9mm ammunition round seized from the bathroom vanity;
- v. One (1) document in the name of DOSS relating to a notice to appear from the 36th District Court, dated November 22, 2019, seized from the bedroom closet; and
- vi. One (1) plastic vial with the label “Grandma’s Cookies-Hybrid” with suspected marijuana residue seized from the bedroom.

12. In addition, law enforcement found a lined piece of paper with the Username: 820wdoss and Password: war0226, on the window ledge above the air conditioning in the living room. I believe the username is associated with Willie DOSS, since the username contains “wdoss.”

13. Based on my training and experience, the aforementioned Glock magazine seized from the residence is the standard Glock magazine used for a Glock Model 23 .40 Caliber firearm.

14. Based on my training and experience, a review of the search warrant photographs from the East Outer Drive residence, in comparison with DOSS’s Facebook Live videos, DOSS was in possession of the Glock Model 23 firearm on February 11, 2020, and the ammunition on or about March 3, 2020, in what

appears to be at his East Outer Drive residence located within the Eastern District of Michigan.

15. During February 2020, I contacted MDOC Parole Agent Theresa Krzyzak to reconfirm DOSS's probation address as \*\*\*1 East Outer Drive, Apartment # B-1\*\*, Detroit, Michigan. Agent Krzyzak confirmed DOSS's probation address has not changed, and DOSS's Probation Agent made contact with DOSS at the East Outer Drive residence on December 27, 2019. Agent Krzyzak stated DOSS reported to probation on January 24, 2020, and did not indicate to his probation agent that he has changed residence or telephone number. DOSS also reported to probation on February 14, 2020, and did not indicate to his probation agent that he has changed residence or telephone number.

### **Criminal History of Willie DOSS**

16. Willie DOSS's Computerized Criminal History (CCH) shows that DOSS has the following felony conviction:

- a. May 2018: (Felony Conviction) - Felony- Weapons- Carrying Concealed, Detroit, Michigan.

### **Interstate Nexus**

17. I consulted ATF interstate nexus expert Special Agent (SA) Nathan Triezenberg. SA Triezenberg indicated that a Glock Model 23 semi-automatic pistol that DOSS was in possession of on February 11, 2020, was manufactured

outside of the State of Michigan. Special Agent Nathan Triezenberg also determined such a firearm constitutes a “firearm” as defined in 18 U.S.C. § 921. In addition, the .40 caliber ammunition and 9mm ammunition recovered from his residence on March 3, 2020, was also manufactured outside of the State of Michigan. Therefore, this type of firearm and ammunition would have traveled in and affected interstate or foreign commerce.

### III. CONCLUSION

18. Probable cause exists that Willie DOSS, a convicted felon did, while knowing that he was a felon, knowingly and intentionally separately possess a firearm and ammunition, to wit; one (1) Glock Model 23 semi-automatic pistol and .40 caliber and 9mm ammunition, said firearm and ammunition having travelled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1). This violation occurred within the Eastern District of Michigan.



Rohit Joshi  
Special Agent, ATF

Sworn and subscribed to before me in my presence and/or by reliable electronic means.



HON. DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE